

(A) The name, and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

RESPONSE:

John Paul Escobedo; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information relating to his interactions with Plaintiff at the Nueces County Jail during relevant time period and jail procedures;

Christopher Allen Gomez; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information relating to his interactions with Plaintiff at the Nueces County Jail during relevant time period and jail procedures;

Carlos Casares; Defendant; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information relating to his interactions with Plaintiff at the Nueces County Jail during relevant time period and jail procedures;

Brenda Lynne Hinojosa; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information relating to her interactions with Plaintiff at the Nueces County Jail during relevant time period and jail procedures;

Daniel V. Garza; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information relating to her interactions with Plaintiff at the Nueces County Jail during relevant time period and jail procedures;

Larry Olivarez, Sr ; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information relating to jail procedures;

Custodian of records for the Nueces County Sheriff's Department; Defendant; c/o Nueces County Sheriff's Department; 901 Leopard Street, Corpus Christi, Texas 78401; (361) 887-2222; has information and/or documents relating to Plaintiff's stay(s) at the Nueces County Jail;

Custodian of records for the Corpus Christi Police Department; c/o City of Corpus Christi Police Department; 321 John Sartain, Corpus Christi, Texas, 78401; (361) 886-2615; has information and/or documents relating to Plaintiff's arrest(s) by Corpus Christi Police Department officers;

Officer M. Morrow; Defendant; c/o City of Corpus Christi Police Department; 321 John Sartain, Corpus Christi, Texas, 78401; (361) 886-2615; has information regarding his interactions with Plaintiff and police procedures;

Officer M. Goce; Defendant; c/o City of Corpus Christi Police Department; 321 John Sartain, Corpus Christi, Texas, 78401; (361) 886-2615; has information regarding his interactions with Plaintiff and police procedures;

Irma Cabrera; Defendant; c/o Christus Spohn Memorial Hospital; 2606 Hospital Boulevard, Corpus Christi, Texas 78405; (361) 902-4000; has information regarding her interactions with Plaintiff at the Nueces County Jail and medical examination procedures at the jail;

Alfred Villarreal; Defendant; c/o H.E.B. Grocery Store #1, 4444 Kostoryz, Corpus Christi, Texas 78415; (361) 853-9831; upon information and belief, has information regarding Plaintiff's conduct on said premises prior to Plaintiff's arrest on June 3, 2004;

Eric A. Gonzales; Plaintiff; 3505 Heritage, Corpus Christi, Texas 78415; also c/o Bill Berry and Gail Dorn, Attorneys at Law; P.O. Box 23064, Corpus Christi, Texas 78403; (361) 888-5568;

The responding parties will supplement if further information becomes available in this area.

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

RESPONSE:

The undersigned counsel is in possession of documents pertaining to Plaintiff's custody at the Nueces County Jail, pertaining to the incident which presumably forms the basis of this lawsuit and a digital video disc that contains images from Plaintiff's stay at the Nueces County Jail on June 3rd and 4th, 2004. Such documents and tangible things are available for inspection and copying at a mutually acceptable date and time at the Rangel Law Firm, P.C., 615 Upper North Broadway, Suite 2020, Corpus Christi, Texas.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

RESPONSE:

Not Applicable.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

RESPONSE:

Not applicable.

Respectfully submitted,

s/ Jorge C. Rangel

Jorge C. Rangel

Attorney-in-Charge

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LYNNE HINOJOSA**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record listed below on this 8th day of July, 2005.

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Gail D. C. Dorn
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s/ Jorge C. Rangel
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